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BROOKLYN OFFICE

KTF:KPO
F. #2023R00889

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
----- X

UNITED STATES OF AMERICA

- against -

RATIDZAI MATIKI,

Defendant.

----- X
THE GRAND JURY CHARGES:

INDICTMENT

Cr. No.

(T. 21, U.S.C., §§ 841(a)(1),
841(b)(1)(E)(i), 846, 853(a), 853(p),
952(b), 960(a)(1), 960(b)(5), 963 and 970;
T. 18, U.S.C., §§ 2 and 3551 et seq.)

BLOCK, J.

COUNT ONE
(Conspiracy to Import Ketamine)

BULSARA, M.J.

1. On or about and between November 22, 2023 and November 24, 2023, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant RATIDZAI MATIKI, together with others, did knowingly and intentionally conspire to import a controlled substance into the United States from a place outside thereof, which offense involved a substance containing ketamine, a Schedule III controlled substance, contrary to Title 21, United States Code, Sections 952(b) and 960(a)(1).

(Title 21, United States Code, Sections 963 and 960(b)(5); Title 18, United States Code, Sections 3551 et seq.)

COUNT TWO
(Importation of Ketamine)

2. On or about November 24, 2023, within the Eastern District of New York and elsewhere, the defendant RATIDZAI MATIKI, together with others, did knowingly and intentionally import a controlled substance into the United States from a

place outside thereof, which offense involved a substance containing ketamine, a Schedule III controlled substance.

(Title 21, United States Code, Sections 952(b), 960(a)(1) and 960(b)(5); Title 18, United States Code, Sections 2 and 3551 et seq.)

COUNT THREE
(Conspiracy to Distribute Ketamine)

3. On or about and between November 22, 2023 and November 24, 2023, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant RATIDZAI MATIKI, together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing ketamine, a Schedule III controlled substance, contrary to Title 21, United States Code, Section 841(a)(1).

(Title 21, United States Code, Sections 846 and 841(b)(1)(E)(i); Title 18, United States Code, Sections 3551 et seq.)

COUNT FOUR
(Possession of Ketamine with Intent to Distribute)

4. On or about November 24, 2023, within the Eastern District of New York and elsewhere, the defendant RATIDZAI MATIKI, together with others, did

knowingly and intentionally possess with intent to distribute a controlled substance, which offense involved a substance containing ketamine, a Schedule III controlled substance.

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(E)(i); Title 18, United States Code, Sections 2 and 3551 et seq.)

**CRIMINAL FORFEITURE ALLEGATION
AS TO COUNTS ONE AND TWO**

5. The United States hereby gives notice to the defendant that, upon her conviction of either of the offenses charged in Counts One and Two, the government will seek forfeiture in accordance with Title 21, United States Code, Sections 853(a) and 970, which require any person convicted of such offenses to forfeit: (a) any property constituting, or derived from, any proceeds obtained directly or indirectly as the result of such offenses; and (b) any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses.

6. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 21, United States Code, Sections 853(a), 853(p) and 970)

**CRIMINAL FORFEITURE ALLEGATION
AS TO COUNTS THREE AND FOUR**

7. The United States hereby gives notice to the defendant that, upon her conviction of either of the offenses charged in Counts Three and Four, the government will seek forfeiture in accordance with Title 21, United States Code, Section 853(a), which requires any person convicted of such offenses to forfeit: (a) any property constituting, or derived from, any proceeds obtained directly or indirectly as the result of such offenses; and (b) any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses.

8. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 21, United States Code, Sections 853(a) and 853(p))

A TRUE BILL

FOREPERSON

By: Whitman G.S. Knapp, Asst. U.S. Atty

BREON PEACE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

No. _____

UNITED STATES DISTRICT COURT

EASTERN District of NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

RATIDZIA MATIKI,

Defendant.

INDICTMENT

(T. 21, U.S.C., §§ 841(a)(1), 841(b)(1)(E)(i), 846, 853(a),
853(p), 952(b), 960(a)(1), 960(b)(5), 963 and 970; T. 18,
U.S.C., §§ 2 and 3551 et seq.)

A true bill.

Foreperson

Filed in open court this 13th day,

of December A.D. 20 23

Clerk

Bail, \$ _____

Katherine P. Onyshko, Assistant U.S. Attorney (718) 254-6177